

Exhibit 24
B. Bulloch Deposition Transcript
Excerpts

In the Matter Of:

Jane Doe vs

MindGeek USA

C. BRADEN BULLOCH

July 14, 2023



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*** CONFIDENTIAL - PROTECTIVE ORDER ***

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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JANE DOE on behalf of herself and all
others similarly situated,
Plaintiff,

-against- Civil Action No.

MINDGEEK USA INCORPORATED, 8:21-CV-00338
MINDGEEK S.A.R.L., MG FREESITES,
LTD (D/B/A PORNHUB), MG FREESITES
II, LTD, MG CONTENT RT LIMITED,
AND 9219-1568 QUEBEC, INC.
(D/B/A MINDGEEK),

Defendants.

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VIDEOTAPED STENOGRAPHIC DEPOSITION OF:
C. BRADEN BULLOCH
Friday, July 14, 2023
10:15 a.m. - 6:47 p.m.
Reported Remotely through Videoconference

Reported stenographically by:
Richard Germosen, FAPR, CA CSR No. 14391
RDR, CRR, CCR, CRCR, CSR-CA, NYACR, NYRCR
NCRA/NJ/NY/CA Certified Realtime Reporter
NCRA Realtime Systems Administrator
Job No. 2023-903607

1
2 where do ads intersect with the user experience
3 because user experience is a function of product.

4 Q. To your knowledge, do ads display on
5 the same page as every video that's on MindGeek's
6 websites?

7 ATTORNEY MASSEY: Object to form.

8 A. So to my knowledge and also
9 understanding, you know, the long period of time
10 that we're talking about, there are ads, again, to
11 my knowledge, on video pages today.

12 Q. Is there any point of time -- let me
13 strike that.

14 Is there any point in time since you
15 started in 2009 when MindGeek did not display ads on
16 video pages --

17 (Stenographer clarification.)

18 Q. -- on any of its websites?

19 ATTORNEY JOSEPHS: I'll just restart
20 that. Okay.

21 Q. Is there any point in time since you
22 started working at MindGeek in 2009 when MindGeek
23 did not display ads on video pages on its websites?

24 ATTORNEY MASSEY: Object to form.

25 A. So it would be challenging for me to

1
2 remember everything across those, you know, what are
3 we talking, roughly 15 years, but we often -- we're
4 often testing things for user experience. So is it
5 possible that we did a test where we removed all ads
6 from the video pages to see how -- you know, if that
7 had an impact on the users and their behavior,
8 that's entirely possible.

9 Q. Other than possible tests that you
10 just described, is there any point in time since you
11 started working at MindGeek in 2009 when MindGeek
12 did not display ads on video pages on its websites?

13 A. So can we just refine what we're
14 talking about when we say "websites" here because
15 MindGeek obviously has a lot of websites.

16 Q. Sure. So let's talk about the
17 website -- let's talk about RedTube.

18 Other than possible tests that you
19 described, is there any point in time since you
20 started working at MindGeek when MindGeek did not
21 display ads on video pages on RedTube?

22 A. Outside of the tests, I don't -- I
23 don't specifically recall a time.

24 Q. And since you have worked on the
25 Pornhub.com website, outside of possible tests that

1
2 you described, can you think of any point in time
3 since you've been working on Pornhub that MindGeek
4 has not displayed ads on the video pages on Pornhub?

5 ATTORNEY MASSEY: Object to form.

6 A. So just to clarify, in this case
7 we're talking specifically Pornhub.com?

8 Q. Correct.

9 A. So to my recollection and outside of
10 possible tests, I do not recall a specific time that
11 there was no ads on the video page on Pornhub.com.

12 Q. Do you have any knowledge of how much
13 money MindGeek makes from advertising on video pages
14 on Pornhub.com?

15 ATTORNEY MASSEY: Object to form.

16 A. So, of course, again, there is some
17 time period things. You know, I wouldn't
18 necessarily be the target audience of that kind of
19 reporting, of financial reporting, but over my
20 entire time, I imagine I have seen some reports on
21 advertising revenue.

22 Q. Do you recall who was responsible for
23 creating those reports on advertising revenue?

24 ATTORNEY MASSEY: Object to form.

25 A. I don't -- I can't specifically say,